

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JANE DOE	:	
Plaintiff,	:	
vs.	:	Case No.: 2:21-cv-02538
	:	
BRYN MAWR COLLEGE, ET AL.	:	
Defendants.	:	

PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT

Plaintiff, Jane Doe, pursuant to Federal Rule of Civil Procedure 55(a), hereby requests that the Clerk enter a default against Defendant, David Barreto on the basis that the record in this case demonstrates that Barreto has failed to plead or otherwise defend this action. An Affidavit in support of this Request is attached hereto as Exhibit "A."

WHEREFORE, Plaintiff respectfully requests that the Clerk enter default against Defendant David Baretto.

Respectfully submitted,

THE BEASLEY FIRM, LLC

BY: /s/Grainne B. Lynn
JAMES E. BEASLEY, JR.
GRAINNE B. LYNN
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215.592.1000
215.592.8360 (telefax)
Attorneys for Plaintiff

Dated: December 6, 2021

VERIFICATION

I, Grainne B. Lynn, Esquire, being duly sworn according to law, verify under penalty of perjury that the foregoing information contained in the foregoing Plaintiff's Motion for Leave to Serve by Electronic Mail is true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of 28 U.S.C. §1746.

/s/Grainne B. Lynn

Grainne B. Lynn

Dated: December 6, 2021

CERTIFICATE OF SERVICE

I, Grainne B. Lynn, hereby certify that service of a true and correct copy of the foregoing was served upon counsel listed below:

VIA THE COURT'S ECF SYSTEM

Michael Baughman, Esq.
Rosemary T. Cochrane, Esq.
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Attorneys for Defendant Bryn Mawr College

VIA ELECTRONIC MAIL AND CLERK OF COURTS

Nelson David Gomez Barretto
47 W. Mount Airy Avenue
Philadelphia, PA 19119-2402

/s/Grainne B. Lynn
Grainne B. Lynn

Date: December 6, 2021